

## Danner, Ward

---

**From:** Santos, Carmen  
**Sent:** Wednesday, September 18, 2013 9:05 AM  
**To:** Goloubow, Ron; Angela Andrews  
**Cc:** Lieben, Ivan; Armann, Steve  
**Subject:** RE: PCBs: Revised PCB Cleanup Completion Report and Covenant - Aspire School - 66th Avenue, Oakland, CA

Tracking:	Recipient	Delivery	Read
	Goloubow, Ron		
	Angela Andrews		
	Lieben, Ivan	Delivered: 9/18/2013 9:05 AM	Read: 9/18/2013 9:38 AM
	Armann, Steve	Delivered: 9/18/2013 9:05 AM	

Hello Ron:

Thank you for writing regarding the Aspire cleanup completion report.

We had provided significant comments on previous versions of the Addendum Report and have commented earlier this year on the technical content and lay out of the report. Our preference is that such report not be referred to as an Addendum report but as a cleanup completion report that includes as an attachment the report that was prepared before all the actual final steps of the physical cleanup of the Aspire property was completed. Therefore, our expectations are to receive the documents listed in your message and those documents being responsive to all the comments that have been provided to ARCADIS. Responses to EPA's comments are fine, however, the cleanup completion report needs to be revised and the revisions responsive to those comments.

Please refer to our messages from 2012 and earlier in 2013 regarding technical issues with the cleanup completion report. In addition, the cleanup completion report needs to be consistent with USEPA's requirements for such report established in the conditional approval of the cleanup activities.

The information presented in your message, if the same as in the last version of the report that we reviewed last year and earlier this year, then that information seem to be adequate as long as it is responsive to all the comments that we already provided in the previous versions of the cleanup completion report. The report should also include a table as to how and if Aspire met each of the conditions of approval. Any deviations from those conditions, if any, should also be explained.

Thank you for your courtesies and please call or write if you have any questions concerning this message.

Sincerely,  
Carmen

Carmen D. Santos  
PCB Coordinator  
USEPA Region 9 (WST-5)  
Waste Management Division  
75 Hawthorne Street

San Francisco, CA 94105  
Voice: 415.972.3360  
santos.carmen@epa.gov

*"Think left and think right and think low and think high. Oh, the things you can think up if only you try!"* Dr. Seuss

---

**Before printing this message and/or attachments, think if it is necessary. Think Green.**

---

{ This e-mail message, including any attachments, may contain non public, privileged, and/or confidential information solely intended to be conveyed to the designated recipient(s). If you receive this e-mail message and are not an intended recipient, please delete this e-mail message and its attachments immediately. The unauthorized use, dissemination, distribution, or reproduction of this e-mail and its attachments is strictly prohibited by law. }

---

**From:** Goloubow, Ron [mailto:Ron.Goloubow@arcadis-us.com]  
**Sent:** Monday, September 16, 2013 1:21 PM  
**To:** Santos, Carmen; Angela Andrews  
**Cc:** Lieben, Ivan; Armann, Steve  
**Subject:** RE: PCBs: Revised PCB Cleanup Completion Report and Covenant - Aspire School - 66th Avenue, Oakland, CA

Team - ARCADIS is in to process of revising the documents for the Aspire School Site in Oakland and I want to make sure we are in agreement as to what is going to be provided to the EPA on or before October 15, 2013. Here is my understanding as to what will be provided for EP's review.:

#### **Revised DRAFT Addendum to the PCB Cleanup Completion Report**

This document will include responses to the comments provided by EPA in March 2013.

As a reminder this report provides the following

- Summary of additional remedial actions conducted following the submittal of the Implementation Report (dated August 12, 2010)
- A summary of the PCB-affected soil that remains at the Site
- Summary of mitigation measures for the PCB-affected soil that remains at the Site;
- Soil sample laboratory analytical data;
- Revised health risk screening calculations;
- Fill material source information and laboratory analytical data
- Waste disposal information and
- Revised figures showing:
  - Details regarding the surface cap, the landscaped areas, and the redevelopment plan);
  - Survey coordinates for the location of soils beneath the cap containing PCBs at concentrations above the cleanup level of 0.130 milligrams per kilogram and
  - Areas where cleanup levels were achieved, where the cleanup levels were not achieved, and where soils contaminated with PCBs above the cleanup level were consolidated beneath the cap at depths ranging from approximately 1 to 4 feet below the current ground surface.

The addendum, along with the Implementation Report, will provide a comprehensive summary of the SICP.

### **Revised Draft Operation and Maintenance Plan for Cap Mitigation Measures**

This document will include the schedule for cap inspection, cap maintenance, and cap repair and will include responses to the comments provided by EPA in March 2013.

### **Draft Land Use Covenant**

This document is being prepared using the example document provided by EPA in January 2013.

### **Cap Inspection Report**

The cap inspection report from September 2013

Please let me know if these are the documents that EPA is expecting.

Thanks Ron.

**Ron Goloubow** | Principal Geologist | [ron.goloubow@arcadis-us.com](mailto:ron.goloubow@arcadis-us.com)  
ARCADIS U.S., Inc. | 2000 Powell Street, Suite 700 | Emeryville, CA 94608  
T: 510 596 9550 | M: 510 501 1789 | F: 510 652 4906  
Connect with us! [www.arcadis-us.com](http://www.arcadis-us.com) | [LinkedIn](#) | [Twitter](#) | [Facebook](#)  
ARCADIS, Imagine the result

---

**From:** Santos, Carmen [<mailto:Santos.Carmen@epa.gov>]

**Sent:** Friday, August 30, 2013 1:00 PM

**To:** Goloubow, Ron; Angela Andrews

**Cc:** Lieben, Ivan; Armann, Steve

**Subject:** PCBs: Revised PCB Cleanup Completion Report and Covenant - Aspire School - 66th Avenue, Oakland, CA

Dear Mr. Ron Goloubow and Ms. Angela Andrews:

As of June 2013 we have not received the revised PCB cleanup completion report for the subject Aspire School despite our repeated requests for those documents during the last two years. Conditions of approval in EPA's approval of the PCB cleanup work requires that such a report be submitted in addition to a land use covenant, cap inspection, maintenance, and repair plan for review and approval of the language prior to recordation of the covenant. We have reviewed all the draft documents and have provided Mr. Goloubow with comments on such documents. Those comments were also discussed with Mr. Goloubow through conference calls.

In order to determine the PCB cleanup conducted at the Aspire School property in Oakland (66<sup>th</sup> Avenue) was completed consistent with all conditions in EPA's PCB cleanup approval for the Aspire property, the required PCB cleanup completion report, cap inspection, repair, and maintenance plan, and land use covenant must be submitted for EPA approval. The Alameda County Department of Health must also be included in the review of those documents. Lacking the required documentation, EPA cannot make such a determination. In addition, cap requirements include routine inspections of the cap which in this case consists of all paved areas at the school. Please provide copies of cap inspection reports conducted since completion of the cap.

We are requesting the required documents be submitted not later than October 15, 2013. In replying to this message, we would greatly appreciate you providing an appropriate contact for College for Certain as well as the contact information for the legal counsel with whom we could discuss the above matters.

Thank you for your courtesies.

Sincerely,

Carmen D. Santos  
PCB Coordinator  
USEPA Region 9 (WST-5)  
Waste Management Division  
75 Hawthorne Street  
San Francisco, CA 94105  
Voice: 415.972.3360  
[santos.carmen@epa.gov](mailto:santos.carmen@epa.gov)

*"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!" Dr. Seuss*

---

**Before printing this message and/or attachments, think if it is necessary. Think Green.**

---

{This e-mail message, including any attachments, may contain non public, privileged, and/or confidential information solely intended to be conveyed to the designated recipient(s). If you receive this e-mail message and are not an intended recipient, please delete this e-mail message and its attachments immediately. The unauthorized use, dissemination, distribution, or reproduction of this e-mail and its attachments is strictly prohibited by law.}

---

NOTICE: This e-mail and any files transmitted with it are the property of ARCADIS U.S., Inc. and its affiliates. All rights, including without limitation copyright, are reserved. The proprietary information contained in this e-mail message, and any files transmitted with it, is intended for the use of the recipient(s) named above. If the reader of this e-mail is not the intended recipient, you are hereby notified that you have received this e-mail in error and that any review, distribution or copying of this e-mail or any files transmitted with it is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately and delete the original message and any files transmitted. The unauthorized use of this e-mail or any files transmitted with it is prohibited and disclaimed by ARCADIS U.S., Inc. and its affiliates. Nothing herein is intended to constitute the offering or performance of services where otherwise restricted by law.